

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OPERA SOLUTIONS LLC,
OPSOLO GLOBAL LTD., and
OPERA SOLUTIONS SHANGHAI LTD.,

Plaintiffs,

- against -

XIAODONG YAN, XDYAN, LLC,
DIA ASSOCIATES, LLC, IVO NIKOLOV and
ANDREY S. KULJIEV

Defendants.

X : **ECF CASE**
: :
: :
: : Civil Action No. 08 CV 03284
: : (HB)(THK)
: :
: :
: :
: : **NOTICE OF PLAINTIFFS'**
: : **CROSS-MOTION FOR TO LEAVE**
: : **TO AMEND THE FIRST**
: : **AMENDED COMPLAINT**
: : **PURSUANT TO F.R.C.P. 15(a)**
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PLEASE TAKE NOTICE that upon the annexed declaration of George C. Springer, Jr., sworn on May 14, 2008, and upon the exhibit attached thereto, and the accompanying Memorandum of Law in Opposition to Defendants' Motion to Dismiss and in Support of Plaintiffs' Cross- Motion for Leave to Amend Plaintiffs' First Amended Complaint, and the pleadings herein, Plaintiffs will move this Court, before the Honorable Harold Baer, Jr., for an Order denying the Motion to Dismiss and, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, for an Order granting leave to Plaintiffs to file the proposed Second Amended Complaint.

Dated: Hartford, CT
May 14, 2008

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